UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION II

DATE: OCT 5 1990

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SUBJECT: Water Management Review of the Draft Remedial Investigation for L.E. Carpenter Site, NJ

FROM: Debra S. Curry, Acting Chief DSC for
Ground Water Management Section

TO:
Raymond Basso, Chief
New Jersey Compliance Branch, ERRD

As requested in your August 7, 1990 memorandum, and in accordance with the Memorandum of Interdivisional Coordination between the Water Management Division (WMD) and the Emergency and Remedial Response Division, WMD has reviewed the Draft Remedial Investigation (RI) for the L.E. Carpenter Site, Wharton, New Jersey from the water programs perspective. We offer the following comments:

- According to the U.S. EPA's proposed Ground Water Classification Guidelines, ground water at this site is at least Class IIA, a current source of drinking water. Because of this classification, maximum contaminant levels (MCLs) are applicable or relevant and appropriate requirements (ARARs) for ground water at the site, and the 500 series methods of analysis should be used for determining volatile organic chemical (VOC) concentrations.

- The Hydrogeologic Section should identify the aquifer(s) being tested.

- A complete well survey of all potable wells within a two mile radius of the site should be implemented and the two indicated public supply wells should be identified as to ownership.

- The potable wells that are cited in the RI should be tested for contaminants of concern if not already done so.

- It is indicated that three wells are actively recovering floating product from the east portion of the site. These extraction wells are designated as MW-6, MW-7 and MW-10. According to Figure 1, wells MW-6 through MW-10 are designated Groundwater Technology Monitor Wells. It should be clearly documented as to which wells are for extraction, and which are for monitoring purposes.

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- In Section 4.6.2, Groundwater Sampling, the RI should indicate where the purge volume was placed during well development. The proper disposal insures the integrity of the well.

- It is indicated that no surface water or stream sediment sampling was performed in Area II, but no reason is given. This exclusion should be explained.

- In view of the fact that surface runoff may be a possible mechanism of contamination transport, WMD recommends at least one additional surface and sediment sampling location in Area III.

- Ground water elevations, for shallow wells, as indicated in Table(s) 30 and 31 were measured a few days apart during October, 1989. WMD recommends additional measurement during the time of the seasonally high water table in order to more accurately portray the ground water regime.

- The presence of buried drums, referred to in the conclusion, was found via the excavation of test pits. It is indicated that chemical analysis was performed on soils immediately under the drums to determine the extent of drum disposal. In addition, for determining the extent of buried drums, WMD recommends geophysical methods be employed, if additional drum burial areas are suspected.

- WMD does not agree with the delay in identification of ARARs until the Feasibility Study is begun. Identification of ARARs in the RI phase should be accomplished to insure that any planned remedial action, if implemented will attain ARARs in a timely manner.

- Table E-1 of Volume II shows the tests that exceeded holding times. Are these results valid? The fact that holding times were exceeded for some tests should be stated in the RI. Will there be some re-sampling of these areas?

Thank you for the opportunity to comment. If you have any questions, please call me or Audrey Moore of my staff at extension 5718.

cc: J. Josephs
R. Hargrove